

SO ORDERED.



Cathy Seibel
CATHY SEIBEL, U.S.D.J.

11/5/21

FORESTERHAYNIE

Real Attorneys. Real People. Real Results.

Jay Forester
Partner
jay@foresterhaynie.com
214-210-2100

Forester Haynie PLLC
400 N. Saint Paul Street | Suite 700
Dallas, Texas 75201
1-844-999-WAGE

November 5, 2021

VIA ELECTRONIC FILING

Hon. Cathy Seibel, U.S. District Judge
US District Court, Southern District of New York

Re: *Sawaqed v. JMC Holdings, Ltd., et al.*

Case No. 7:21-cv-06664-CS

To the Honorable Cathy Seibel,

We write with regards to the above-referenced matter and service of the Complaint filed in the same. Plaintiff filed his Original Complaint on August 6, 2021, and the date to serve the Complaint on Defendants is November 4, 2021.

We write to request an extension of 45 days to serve Defendants with process. Since the filing of Plaintiff's Complaint, the attorney admitted to the Southern District of New York, and serving as lead filer in the matter, Ashley Pileika, is no longer with our firm. Subsequently we request the extension not for the sake of delay, but to obtain local counsel to continue the litigation. Our firm is working diligently with new counsel to resolve these issues and aims to be prepared to file the requisite proof of service within this requested extension. Further, service has already been completed on Defendants at the time of this request. This extension is sought not for the sake of delay, but so that the Parties' resources may be preserved and so that justice may be done.

We thank the Court for its time and consideration of this request.

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. Forester", with a stylized flourish at the end.

Jay Forester